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Attorney for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

JAMSHID NORYIAN,
A.K.A. JAMES NORYIAN, *ET. AL.*,

DEFENDANTS.

Case No. 17-cr-155-L

OBJECTIONS TO PROPOSED
EXHIBITS

THIS PLEADING PERTAINS TO

MICHAEL TABA, [D-07]

Dr. Michael Taba, accused, hereby files the following objections to Proposed Exhibits.

Dr. Taba takes no position on any exhibit not specifically listed here. To save space, Dr.

Taba only addresses exhibits to which he specifically objects.

GOVERNMENT EXHIBITS

Government Exhibit Number	Identification	Objection	Notes
212	DOL Billing Data for Ability	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary	
213	BCBS Billing Data for Ability and Industrial & Family Pharmacy	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary	
214	DOL Billing Data for Industrial & Family Pharmacy	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary	
215	DOL Billing Data for Park Row Pharmacy	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary	
216	BCBS Billing for Park Row Pharmacy	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary	

217	DOL Third Party Billers	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary	
218	Prime Therapeutics - Ability	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary	
219	Prime Therapeutics – Park Row	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary	
421	Summation of Claims for R.C. – Count 7	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous	
422	Claims for R.C. from VA – Count 7	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous	
425	Claim for L.B. from VA – Count 8	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous	
426	Summation of Claims for L.B. – Count 8	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous	

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429	Claim for J.A. from VA – Count 9	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous	
430	Summation of Claims for J.A. – Count 9	403 – Prejudice; Misleading 802 - Hearsay 901 – Authentication 1006 – Accuracy; Improper Use of summary; Records Are Not Voluminous	
720	Correspondence between Dr. Taba and Counsel	403 – Prejudice 404 – Prior Bad Act Evidence 502 – Attorney/Client Privilege 901 – Authentication	
848	Statement of Revenue per Physician	403 – Prejudice 901 – Authentication; Accuracy; 6 th Amendment – Confrontation/ <i>Bruton</i>	
863	Statement of Revenue per Physician	403 – Prejudice 901 – Authentication; Accuracy; 6 th Amendment – Confrontation/ <i>Bruton</i>	
1001	Total Billed to DOL-OWCP	403 – Prejudice; Relevance 901 – Authentication 1006 – Accuracy	
1002	Total Paid by DOL-OWCP	403 – Prejudice; Relevance 901 – Authentication 1006 – Accuracy	
1009	Deposits of DOL Funds	403 – Prejudice; Relevance; Cumulative 1006 – Improper Use of Summation	

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1021	Payments Made to Dr. Michael Taba	901 – Authentication 1006 – Improper Use of Summation; Accuracy; Completeness	
1022	Payments Made to Dr. Michael Taba	901 – Authentication 1006 – Improper Use of Summation; Accuracy; Completeness	
1023	Other Payments to Dr. Michael Taba	901 – Authentication 1006 – Improper Use of Summation; Accuracy; Completeness	
1024	Dr. Michael Taba Monthly Bank Account Balances	403 – Relevance; Prejudice 1006 – Improper Use of Summation – Records Are Not “Voluminous”	

DEFENDANT JAMSHID NORIYAN

Dr. Michael Taba takes no position on exhibits proposed by Mr. Jamshid Noryian.

DEFENDANT DEHSHID NOURIAN

Dr. Michael Taba takes no position on exhibits proposed by Mr. Dehshid Nourian.

DEFENDANT CHRISTOPHER RYDBERG

Dr. Michael Taba takes no position on exhibits proposed by Mr. Christopher Rydberg.

DATED this 21st day of August, 2023, at Dallas, Texas.

Steven M. Wells, PC
Attorneys for Defendant

By: /s/ Steven M. Wells.
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Erin Brennan
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By: /s/ Erin Brennan.
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CERTIFICATE OF SERVICE

I certify that on August 21, 2023,
I served a copy of the Objections
To Proposed Exhibits Through
ECF on:

All parties of record

/s/ Steven M. Wells.
Steven M. Wells, PC